

REMARKS/ARGUMENTS

Claims 1 and 12 have been amended. No new matter has been added. Claims 1 through 12 remain in the application.

**Claim rejections under 35 U.S.C. 103(a)**

*Claims 1-12 were rejected under 35USC 103(a) as being unpatentable over U.S. Patent No. 5,625,827 issued to Krause et al (Krause).*

Applicant amends in part and traverses in part. The claims were amended to clarify the invention. The claims, as amended, are believed to be non-obvious. No new matter has been added. The Krause reference describes a drawing program analyzer which links documents to each other, computes lengths or areas of displayed images, and displays documents in particular ways. Krause represents a system for managing blueprints and does not systematically create and verify the contents of entities within the drawing. That is, Krause's invention does not pass judgment on the contents provided within the blueprint, but simply operates externally on whatever it is provided. Krause has no verification of the sufficiency of objects within the blueprints and thus can not ensure a useful definition of the environment. While commercially available blueprint drawing tools, such as those which would be used in conjunction with Krause or incorporated into Krause, allow generic creation and editing of blueprints, none of them have provided a means for automatically or systematically verifying the sufficiency of objects to ensure a useful definition of the physical environment and notifying a user of the results of the verification of sufficiency.

It should be understood that Krause is addressing a completely different issue than the present invention. That is, Krause allows for storage, and retrieval of a number of blueprints, selective viewing of particular portions of blueprints, and performing calculations and analyses on displayed blueprints. In short, Krause does not teach or suggest constructing a database that can be used to generate a useful definition of a user's physical environment as is set forth in the claims.

At no point, does Krause perform any “verification” whatsoever. Verification is discussed in the patent application at several points. The Examiner states in the Office action dated April 5, 2007 that Krause shows verification and refers to col. 5, lines 1-14, and col. 5, lines 43-45. However, inspection of the cited passages in Krause reveals that this portion of Krause deals with the selection of drawings to be displayed, not “verification” of the sufficiency of any of the plurality of objects to ensure a useful definition of the environment, as required by independent claims 1 and 12. Note particularly that the cited passages of the reference describe a user viewing a limited number of specific blueprint drawing files to be used in and associated with a project. A project memory (58) will reference a primary document and any of several secondary documents. Thus, a user is able to enter a project name into the Krause, system, and obtain a certain group of drawings.

The Examiner’s interpretation of Krause mischaracterizes the reference. No verification is performed in Krause. In addition, no verification would be performed since Krause is not directed to constructing a database where formatted data can be transported and used in an engineering planning model or other application.

The Examiner appears to have minimized the requirement of generating a set of formatted data in a form transportable to and useable by an engineering planning model or other application, as claimed by Applicant’s invention. In the Office action dated April 5, 2007, the Examiner concedes that Krause does not explicitly teach generating a set of formatted data. The Examiner goes on to state that it would have been obvious to one having ordinary skill in the art at the time the invention was made to “generate a set of formatted data and in view of Krause’s teaching of blueprint models and files of construction drawings and to incorporate in Krause the generation of a set of formatted data because such a modification would allow Krause’s system to relate the formatted data to the blueprint models and files of the construction drawings.” Applicant respectfully disagrees. As explained in Applicant’s Background section, disparate, non-formatted blueprints and the like do not permit generation of a usable model of an environment. For that, formatted data is required, and the sufficiency of the formatted data is required (“verification”). Applicant’s invention is specifically focused on a

method and apparatus which allows fast and repeatable construction of a database that creates objects defining an environment, verifies the sufficiency of the objects to ensure a useful definition of a user's physical environment, and notifies a user of results of the verification of sufficiency

Accordingly, applicant respectfully requests reconsideration of claims 1 and 12. The remaining claims 2-11 provide further limitations to what are believed to be allowable claims and as such are also in condition for allowance.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

The Applicants believe that the subject application, as amended, is in condition for allowance. Such action is earnestly solicited by the Applicants.

In the event that the Examiner deems the present application non-allowable, it is requested that the Examiner telephone the Applicant's attorney or agent at the number indicated below so that the prosecution of the present case may be advanced by the clarification of any continuing rejection.

The Commissioner is hereby authorized to charge Deposit Account 502117,  
Motorola, Inc., with any fees which may be required in the prosecution of this application.

Respectfully submitted,

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